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May 22, 2020

**Via ECF**

The Honorable Ona T. Wang  
United States Magistrate Judge  
United States District Court for the Southern District of New York  
500 Pearl St., Courtroom 20D  
New York, NY 10007-1312

**Re: *In Re Application of Vale S.A., Vale Holdings B.V., and Vale International S.A. for an Order Pursuant to 28 U.S.C. § 1782 to Conduct Discovery for use in Foreign Proceeding, No. 1:20-mc-00199-JGK-OTW (S.D.N.Y.)***

Dear Judge Wang:

We represent Respondent Fine Arts NY LLC ("Fine Arts") in the above-captioned application by Vale S.A., Vale Holdings B.V., and Vale International S.A. (collectively, "Vale") to conduct discovery for use in foreign proceedings pursuant to 28 U.S.C. § 1782 ("Application"). We write regarding Fine Arts' Opposition to the Application ("Opposition"), Dkt. No. 15, and Vale's Reply in Support of the Application ("Reply"), Dkt. No. 16. As Vale has acknowledged, with respect to Fine Arts, the Application is fully briefed. Dkt. No. 20.

Accordingly, pursuant to Your Honor's Individual Practice Rule III(e), Fine Arts respectfully requests oral argument on Vale's Application. *See In re Sarrio, S.A.*, 119 F.3d 143, 148 (2d Cir. 1997) (party from who discovery is sought has the "right to challenge" an order under section 1782).

Respectfully submitted,



Jennifer Selendy  
Partner

Cc: All Counsel of Record (via ECF)